

# EXHIBIT A

**Archived:** Tuesday, August 8, 2023 4:02:14 PM

**From:** [Ari Ungar](#)

**Mail received time:** Wed, 4 May 2022 19:23:08

**Sent:** Thu, 5 May 2022 00:22:44

**To:** [EXT david.lizmi@squirepb.com](#) Aaron Schlanger Goldstein, Linda [EXT Mitchell Berger EXT gassan.baloul@squirepb.com](#)  
[EXT joseph.alonzo@squirepb.com](#) [EXT jonathan.siegfried@dlapiper.com](#) McGinley, Michael Romeo, Justin M. [EXT Mark Hanchet EXT RHamburg@mayerbrown.com](#) [EXT Andrew Pincus EXT Marc Cohen EXT alakatos@mayerbrown.com](#) [EXT choupt@mayerbrown.com](#) [EXT HWeisburg@Shearman.com](#) [EXT Mike Sullivan EXT bleske@ashcroftlawfirm.com](#) Rivkin, David DeLaquil, Mark Foley, Elizabeth P. [EXT ccurran@whitecase.com](#) [EXT nerb@whitecase.com](#)

**Cc:** [Gary Osen Cindy Schlanger Michael Radine Dina Gielchinsky tab@turner.com](#)

**Subject:** RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

**Importance:** Normal

**Sensitivity:** None

---

**\*\*EXTERNAL SENDER\*\***

David,

Thank you for your e-mail and Defendants' further proposed edits. We hope that we are close to reaching an agreement. To that end, we will agree to all of Defendants' additional proposed edits with the following exceptions:

Paragraph C

As stated in my April 6 e-mail, it is critical from our standpoint to retain the exact language we proposed:

"However, a Party may move before the Court in this Litigation by letter motion to request permission to use Discovery Material in another case or matter, and nothing herein waives any right a Party has to object to said motion."

While we recognize the importance of the protective order for bank customers that might potentially agree to waive Lebanese bank secrecy, we think the protective order's language sufficiently safeguards the confidentiality of any records Defendants may produce. We cannot stipulate to foreclose the *possibility* of moving before the Court because it is impossible to anticipate every potential scenario where relief of some kind might be required. Of course, nothing in the protective order prevents Defendants from raising customer waiver as an additional basis for objecting to such a request if it ever materializes.

Paragraph D2

- Defendants added the language "and other sensitive personal information that may be subject to U.S. or foreign laws."

Plaintiffs propose a slight modification: "and other similar sensitive personal data that may be subject to U.S. or foreign laws." This tracks the language used above in this paragraph, and it hopefully obviates the need for a stand-alone definition of "sensitive personal information."

Paragraph E2

Finally, as previously indicated in my April 6 e-mail, we will agree to your removal of this paragraph, but only if the verbiage we proposed in Paragraph C is accepted.

Regards,

Ari Ungar  
Attorney at Law

**OSEN LLC**

190 Moore Street, Suite 272  
Hackensack, New Jersey 07601 / USA  
Telephone 201.265.6400  
Facsimile 201.265.0303  
[aungar@osenlaw.com](mailto:aungar@osenlaw.com)  
[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. Osen LLC - Attorneys at Law.

---

**From:** Lizmi, David <david.lizmi@squirepb.com>  
**Sent:** Sunday, May 1, 2022 8:44 PM  
**To:** Ari Ungar <aungar@osenlaw.com>; Aaron Schlanger <aschlanger@osenlaw.com>; Goldstein, Linda <Linda.Goldstein@dechert.com>; Berger, Mitchell <mitchell.berger@squirepb.com>; Baloul, Gassan A. <gassan.baloul@squirepb.com>; Alonzo, Joseph <joseph.alonzo@squirepb.com>; EXT jonathan.siegfried@dlapiper.com <jonathan.siegfried@dlapiper.com>; McGinley, Michael <Michael.McGinley@dechert.com>; Romeo, Justin M. <Justin.Romeo@dechert.com>; EXT Mark Hanchet <MHanchet@mayerbrown.com>; EXT RHamburg@mayerbrown.com <RHamburg@mayerbrown.com>; EXT Andrew Pincus <APincus@mayerbrown.com>; EXT Marc Cohen <mcohen@mayerbrown.com>; EXT alakatos@mayerbrown.com <alakatos@mayerbrown.com>; EXT choupt@mayerbrown.com <choupt@mayerbrown.com>; EXT HWeisburg@Shearman.com <HWeisburg@Shearman.com>; EXT Mike Sullivan <msullivan@ashcroftlawfirm.com>; EXT bleske@ashcroftlawfirm.com <bleske@ashcroftlawfirm.com>; Rivkin, David <drivkin@bakerlaw.com>; DeLaquil, Mark <mdelaquil@bakerlaw.com>; Foley, Elizabeth P. <efoley@bakerlaw.com>; EXT ccurran@whitecase.com <ccurran@whitecase.com>; EXT nerb@whitecase.com <nerb@whitecase.com>  
**Cc:** Gary Osen <gosen@osenlaw.com>; Cindy Schlanger <cschlanger@osenlaw.com>; Michael Radine <mradine@osenlaw.com>; Dina Gielchinsky <dgielchinsky@osenlaw.com>; tab@tturner.com  
**Subject:** RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good Evening Ari,

Please see the attached draft Protective Order, in consideration of Plaintiffs' proposed edits.

Thanks,

David

**From:** Ari Ungar <[aungar@osenlaw.com](mailto:aungar@osenlaw.com)>

**Sent:** Thursday, April 21, 2022 11:29 AM

**To:** Lizmi, David <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>; Aaron Schlanger <[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)>; Goldstein, Linda <[Linda.Goldstein@dechert.com](mailto:Linda.Goldstein@dechert.com)>; Berger, Mitchell <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; Baloul, Gassan A. <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>; Alonzo, Joseph <[joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com)>; EXT [jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com) <[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; McGinley, Michael <[Michael.McGinley@dechert.com](mailto:Michael.McGinley@dechert.com)>; Romeo, Justin M. <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; EXT Mark Hanchet <[MHanchet@mayerbrown.com](mailto:MHanchet@mayerbrown.com)>; EXT [RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com) <[RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com)>; EXT Andrew Pincus <[APincus@mayerbrown.com](mailto:APincus@mayerbrown.com)>; EXT Marc Cohen <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; EXT [alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com) <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; EXT [choupt@mayerbrown.com](mailto:choupt@mayerbrown.com) <[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)>; EXT [HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com) <[HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com)>; EXT Mike Sullivan <[msullivan@ashcroftlawfirm.com](mailto:msullivan@ashcroftlawfirm.com)>; EXT [bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com) <[bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com)>; Rivkin, David <[drivkin@bakerlaw.com](mailto:drivkin@bakerlaw.com)>; DeLaquil, Mark <[mdealaquil@bakerlaw.com](mailto:mdealaquil@bakerlaw.com)>; Foley, Elizabeth P. <[efoley@bakerlaw.com](mailto:efoley@bakerlaw.com)>; EXT [ccurran@whitecase.com](mailto:ccurran@whitecase.com) <[ccurran@whitecase.com](mailto:ccurran@whitecase.com)>; EXT [nerb@whitecase.com](mailto:nerb@whitecase.com) <[nerb@whitecase.com](mailto:nerb@whitecase.com)>

**Cc:** Gary Osen <[gosen@osenlaw.com](mailto:gosen@osenlaw.com)>; Cindy Schlanger <[cschlanger@osenlaw.com](mailto:cschlanger@osenlaw.com)>; Michael Radine <[mradine@osenlaw.com](mailto:mradine@osenlaw.com)>; Dina Gielchinsky <[dgielchinsky@osenlaw.com](mailto:dgielchinsky@osenlaw.com)>; [tab@turner.com](mailto:tab@turner.com)

**Subject:** [EXT] RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

Hi David,

Can you please provide your collective position on the open issues delineated below? Alternatively, if you prefer, the parties can submit their competing versions of the protective order to the Court.

Regards,

Ari Ungar  
Attorney at Law

**OSEN LLC**  
190 Moore Street, Suite 272  
Hackensack, New Jersey 07601 / USA  
Telephone 201.265.6400  
Facsimile 201.265.0303  
[aungar@osenlaw.com](mailto:aungar@osenlaw.com)  
[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. Osen LLC - Attorneys at Law.

---

**From:** Ari Ungar

**Sent:** Wednesday, April 6, 2022 9:43 AM

**To:** Lizmi, David <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>; Aaron Schlanger <[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)>; Goldstein, Linda <[Linda.Goldstein@dechert.com](mailto:Linda.Goldstein@dechert.com)>; Berger, Mitchell <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; Baloul, Gassan A. <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>; Alonzo, Joseph <[joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com)>; EXT [jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com) <[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; McGinley, Michael <[Michael.McGinley@dechert.com](mailto:Michael.McGinley@dechert.com)>; Romeo, Justin M. <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; EXT Mark Hanchet <[MHanchet@mayerbrown.com](mailto:MHanchet@mayerbrown.com)>; EXT [RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com) <[RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com)>; EXT Andrew Pincus <[APincus@mayerbrown.com](mailto:APincus@mayerbrown.com)>; EXT Marc Cohen <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; EXT [alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com) <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; EXT

Case 1:19-cv-00007-CBA-TAM Document 355-1 Filed 10/25/23 Page 5 of 12 PageID  
choupt@mayerbrown.com <choupt@mayerbrown.com>; EXT #18101 Weisburg@Shearman.com <HWeisburg@Shearman.com>; EXT  
Mike Sullivan <msullivan@ashcroftlawfirm.com>; EXT bleske@ashcroftlawfirm.com <bleske@ashcroftlawfirm.com>; Rivkin,  
David <drvkin@bakerlaw.com>; DeLaquil, Mark <mdealaquil@bakerlaw.com>; Foley, Elizabeth P. <efoley@bakerlaw.com>;  
EXT ccurran@whitecase.com <ccurran@whitecase.com>; EXT nerb@whitecase.com <nerb@whitecase.com>  
**Cc:** Gary Osen <gosen@osenlaw.com>; Cindy Schlanger <cschlanger@osenlaw.com>; Michael Radine  
<mradine@osenlaw.com>; Dina Gielchinsky <dgielchinsky@osenlaw.com>; tab@tturner.com  
**Subject:** RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

David,

Thank you for sending us Defendant-Banks' proposed edits to the draft Protective Order, in track changes. There appear to be only a few outstanding issues to resolve, which we've delineated below with our proposals to resolve them:

Paragraph C - Defendants crossed out the language:

However, a Party may move before the Court in this Litigation by letter motion to request permission to use Discovery Material in another case, and nothing herein waives any right a Party has to object to said motion.

Virtually every protective order we have been involved in contains language noting that a party can move to modify the order. We ask that you reconsider your position. If the Defendant-Banks still insist on striking that language, we should just present the issue to the Court for resolution.

Paragraph E 2 - Defendants crossed out the language:

Nothing in this Protective Order shall prohibit any Party from providing Protected Information produced under the Order to U.S. federal or state law enforcement or regulatory agencies that address terrorism financing, money laundering, or other financial crimes-related issues in the event a Party believes that Protected Information produced under the Order indicates that a felony has been committed. At least five (5) business days prior to sharing such Protected Information with any such U.S. law enforcement or regulatory agency, the disclosing Party is required to notify the Party who originally produced the Protected Information.

Plaintiffs will agree to this deletion, but only if Defendant-Banks agree to our original language above for Paragraph C, extended to include "another case or matter." If that language remains objectionable to the Defendant-Banks, we will just add this to the list of issues to the Court for resolution.

Paragraph F 1 - Defendants crossed out the language "(except for grand jury subpoenas)." As a compromise, we propose substituting "(to the extent permitted by law.)"

Paragraph F 1 - Defendants crossed out the language giving a party 5 business days to notify other parties in writing and replaced it with a 24-hour deadline. In our view, that is an unrealistically short period of time for a variety of reasons, but we will agree to a 72-hour notification period.

Paragraph L - Plaintiffs generally agree to the proposed edits but propose a slight modification in the language at the end of the paragraph, to wit:

The parties shall include, in any pretrial order entered in this Litigation, protocol their proposed exhibit lists, thereby providing the Designating Party with sufficient advance notice of the Protected Information sought to be introduced at trial to permit the

Designating Party an opportunity to seek the relief contemplated by this provision. # 18102

Plaintiffs have no objections to the remaining proposed edits you provided.

Please let us know your collective position on the 5 open issues.

Regards,

Ari Ungar  
Attorney at Law

**OSEN LLC**

190 Moore Street, Suite 272  
Hackensack, New Jersey 07601 / USA  
Telephone 201.265.6400  
Facsimile 201.265.0303  
[aungar@osenlaw.com](mailto:aungar@osenlaw.com)  
[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. Osen LLC - Attorneys at Law.

---

**From:** Lizmi, David <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>

**Sent:** Tuesday, March 29, 2022 5:32 PM

**To:** Aaron Schlanger <[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)>; Goldstein, Linda <[Linda.Goldstein@dechert.com](mailto:Linda.Goldstein@dechert.com)>; Berger, Mitchell <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; Baloul, Gassan A. <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>; Alonzo, Joseph <[joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com)>; EXT [jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com) <[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; McGinley, Michael <[Michael.McGinley@dechert.com](mailto:Michael.McGinley@dechert.com)>; Romeo, Justin M. <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; EXT Mark Hanchet <[MHanchet@mayerbrown.com](mailto:MHanchet@mayerbrown.com)>; EXT [RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com) <[RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com)>; EXT Andrew Pincus <[APincus@mayerbrown.com](mailto:APincus@mayerbrown.com)>; EXT Marc Cohen <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; EXT [alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com) <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; EXT [choupt@mayerbrown.com](mailto:choupt@mayerbrown.com) <[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)>; EXT [HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com) <[HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com)>; EXT Mike Sullivan <[msullivan@ashcroftlawfirm.com](mailto:msullivan@ashcroftlawfirm.com)>; EXT [bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com) <[bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com)>; Rivkin, David <[drivkin@bakerlaw.com](mailto:drivkin@bakerlaw.com)>; DeLaquil, Mark <[mdelaquil@bakerlaw.com](mailto:mdelaquil@bakerlaw.com)>; Foley, Elizabeth P. <[e Foley@bakerlaw.com](mailto:e Foley@bakerlaw.com)>; EXT [ccurran@whitecase.com](mailto:ccurran@whitecase.com) <[ccurran@whitecase.com](mailto:ccurran@whitecase.com)>; EXT [nerb@whitecase.com](mailto:nerb@whitecase.com) <[nerb@whitecase.com](mailto:nerb@whitecase.com)>

**Cc:** Gary Osen <[gosen@osenlaw.com](mailto:gosen@osenlaw.com)>; Ari Ungar <[aungar@osenlaw.com](mailto:aungar@osenlaw.com)>; Cindy Schlanger <[cschlanger@osenlaw.com](mailto:cschlanger@osenlaw.com)>;

Michael Radine <[mradine@osenlaw.com](mailto:mradine@osenlaw.com)>; Dina Gielchinsky <[dgielchinsky@osenlaw.com](mailto:dgielchinsky@osenlaw.com)>; [tab@turner.com](mailto:tab@turner.com)

**Subject:** RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

Counsel,

Attached please find the Defendant-Banks' proposed edits to the draft Protective Order, in track changes.

Best,

David



**David J. Lizmi**

Principal

Squire Patton Boggs (US) LLP  
1211 Avenue of the Americas, 26th Floor  
New York, NY 10036  
T +1 212 872 9873  
O +1 212 872 9800  
F +1 212 872 9815  
M +1 908 723 0852

[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com) | [squirepattonboggs.com](http://squirepattonboggs.com)

Find Us: [Twitter](#) | [LinkedIn](#) | [Facebook](#) | [Instagram](#)

---

**From:** Aaron Schlanger <[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)>

**Sent:** Monday, March 28, 2022 12:55 PM

**To:** Goldstein, Linda <[Linda.Goldstein@dechert.com](mailto:Linda.Goldstein@dechert.com)>; Berger, Mitchell <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; Baloul, Gassan A. <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>; Alonzo, Joseph <[joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com)>; EXT [jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com) <[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; McGinley, Michael <[Michael.McGinley@dechert.com](mailto:Michael.McGinley@dechert.com)>; Romeo, Justin M. <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; EXT Mark Hanchet <[MHanchet@mayerbrown.com](mailto:MHanchet@mayerbrown.com)>; EXT [RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com) <[RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com)>; EXT Andrew Pincus <[APincus@mayerbrown.com](mailto:APincus@mayerbrown.com)>; EXT Marc Cohen <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; EXT [alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com) <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; EXT [choupt@mayerbrown.com](mailto:choupt@mayerbrown.com) <[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)>; EXT [HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com) <[HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com)>; EXT Mike Sullivan <[msullivan@ashcroftlawfirm.com](mailto:msullivan@ashcroftlawfirm.com)>; EXT [bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com) <[bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com)>; Rivkin, David <[drivkin@bakerlaw.com](mailto:drivkin@bakerlaw.com)>; DeLaquil, Mark <[m delaquil@bakerlaw.com](mailto:m delaquil@bakerlaw.com)>; Foley, Elizabeth P. <[efoley@bakerlaw.com](mailto:efoley@bakerlaw.com)>; EXT [ccurran@whitecase.com](mailto:ccurran@whitecase.com) <[ccurran@whitecase.com](mailto:ccurran@whitecase.com)>; EXT [nerb@whitecase.com](mailto:nerb@whitecase.com) <[nerb@whitecase.com](mailto:nerb@whitecase.com)>; Lizmi, David <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>

**Cc:** Gary Osen <[gosen@osenlaw.com](mailto:gosen@osenlaw.com)>; Ari Ungar <[aungar@osenlaw.com](mailto:aungar@osenlaw.com)>; Cindy Schlanger <[cschlanger@osenlaw.com](mailto:cschlanger@osenlaw.com)>; Michael Radine <[mradine@osenlaw.com](mailto:mradine@osenlaw.com)>; Dina Gielchinsky <[dgielchinsky@osenlaw.com](mailto:dgielchinsky@osenlaw.com)>; [tab@turner.com](mailto:tab@turner.com)

**Subject:** [EXT] RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

Counsel,

We previously wrote to you on February 16, February 25, and March 14 concerning Plaintiffs' proposed edits to the draft protective order that we sent you on February 7, but we have not received a substantive response.

If Defendants are unwilling to accept our proposed compromise language and formulate a joint response, we suggest that the parties submit their competing drafts to the Court and let Magistrate Judge Merkl make the final determination.

Please let us know you if you agree.

Aaron Schlanger  
Attorney at Law

**OSEN LLC**

190 Moore Street, Suite 272  
Hackensack, NJ 07601 / USA  
Telephone 201.265.6400  
Facsimile 201.265.0303  
[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)  
[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. OSEN LLC - Attorneys at Law.

---

**From:** Aaron Schlanger  
**Sent:** Monday, March 14, 2022 12:46 PM  
**To:** Goldstein, Linda <[Linda.Goldstein@dechert.com](mailto:Linda.Goldstein@dechert.com)>  
**Cc:** EXT Mitchell Berger <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; EXT [gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com) <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>;  
EXT [joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com) <[joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com)>; EXT [jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)  
<[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; McGinley, Michael <[Michael.McGinley@dechert.com](mailto:Michael.McGinley@dechert.com)>; [tamer.mallat@dechert.com](mailto:tamer.mallat@dechert.com);  
Romeo, Justin M. <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; EXT Mark Hanchet <[MHanchet@mayerbrown.com](mailto:MHanchet@mayerbrown.com)>; EXT  
[RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com) <[RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com)>; EXT Andrew Pincus <[APincus@mayerbrown.com](mailto:APincus@mayerbrown.com)>; EXT Marc  
Cohen <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; EXT alakatos@mayerbrown.com <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; EXT  
[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com) <[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)>; EXT [HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com) <[HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com)>; EXT  
Mike Sullivan <[msullivan@ashcroftlawfirm.com](mailto:msullivan@ashcroftlawfirm.com)>; EXT [bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com) <[bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com)>; Rivkin,  
David <[drivkin@bakerlaw.com](mailto:drivkin@bakerlaw.com)>; DeLaquil, Mark <[m delaquil@bakerlaw.com](mailto:m delaquil@bakerlaw.com)>; Foley, Elizabeth P. <[efoley@bakerlaw.com](mailto:efoley@bakerlaw.com)>;  
EXT [ccurran@whitecase.com](mailto:ccurran@whitecase.com) <[ccurran@whitecase.com](mailto:ccurran@whitecase.com)>; EXT [nerb@whitecase.com](mailto:nerb@whitecase.com) <[nerb@whitecase.com](mailto:nerb@whitecase.com)>; EXT  
[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com) <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>; Gary Osen <[gosen@osenlaw.com](mailto:gosen@osenlaw.com)>; Ari Ungar  
<[aungar@osenlaw.com](mailto:aungar@osenlaw.com)>; Cindy Schlanger <[cschlanger@osenlaw.com](mailto:cschlanger@osenlaw.com)>; Michael Radine <[mradine@osenlaw.com](mailto:mradine@osenlaw.com)>; Dina  
Gielchinsky <[dgielchinsky@osenlaw.com](mailto:dgielchinsky@osenlaw.com)>; [tab@turner.com](mailto:tab@turner.com)  
**Subject:** RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

Linda,

Following up on your email below, do you have any update for us on Defendants' further comments and proposed changes to the draft protective order? Thanks in advance for your reply.

Aaron Schlanger  
Attorney at Law

**OSEN LLC**  
190 Moore Street, Suite 272  
Hackensack, NJ 07601 / USA  
Telephone 201.265.6400  
Facsimile 201.265.0303  
[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)  
[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. OSEN LLC - Attorneys at Law.

---

**From:** Goldstein, Linda <[Linda.Goldstein@dechert.com](mailto:Linda.Goldstein@dechert.com)>  
**Sent:** Friday, February 25, 2022 3:46 PM  
**To:** Aaron Schlanger <[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)>  
**Cc:** EXT Mitchell Berger <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; EXT [gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com) <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>;

EXT [joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com) <[#18105](mailto:joseph.alonzo@squirepb.com)>; EXT [jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com) <[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; McGinley, Michael <[Michael.McGinley@dechert.com](mailto:Michael.McGinley@dechert.com)>; [tamer.mallat@dechert.com](mailto:tamer.mallat@dechert.com); Romeo, Justin M. <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; EXT Mark Hanchet <[MHanchet@mayerbrown.com](mailto:MHanchet@mayerbrown.com)>; EXT [RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com) <[RHamburg@mayerbrown.com](mailto:RHamburg@mayerbrown.com)>; EXT Andrew Pincus <[APincus@mayerbrown.com](mailto:APincus@mayerbrown.com)>; EXT Marc Cohen <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; EXT [alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com) <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; EXT [choupt@mayerbrown.com](mailto:choupt@mayerbrown.com) <[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)>; EXT [HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com) <[HWeisburg@Shearman.com](mailto:HWeisburg@Shearman.com)>; EXT Mike Sullivan <[msullivan@ashcroftlawfirm.com](mailto:msullivan@ashcroftlawfirm.com)>; EXT [bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com) <[bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com)>; Rivkin, David <[drivkin@bakerlaw.com](mailto:drivkin@bakerlaw.com)>; DeLaquil, Mark <[mdealaquil@bakerlaw.com](mailto:mdealaquil@bakerlaw.com)>; Foley, Elizabeth P. <[efoley@bakerlaw.com](mailto:efoley@bakerlaw.com)>; EXT [ccurran@whitecase.com](mailto:ccurran@whitecase.com) <[ccurran@whitecase.com](mailto:ccurran@whitecase.com)>; EXT [nerb@whitecase.com](mailto:nerb@whitecase.com) <[nerb@whitecase.com](mailto:nerb@whitecase.com)>; EXT [david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com) <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>; Gary Osen <[gosen@osenlaw.com](mailto:gosen@osenlaw.com)>; Ari Ungar <[aungar@osenlaw.com](mailto:aungar@osenlaw.com)>; Cindy Schlanger <[cschlanger@osenlaw.com](mailto:cschlanger@osenlaw.com)>; Michael Radine <[mradine@osenlaw.com](mailto:mradine@osenlaw.com)>; Dina Gielchinsky <[dielchinsky@osenlaw.com](mailto:dielchinsky@osenlaw.com)>; [tab@tturner.com](mailto:tab@tturner.com)

**Subject:** Re: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

Counselor, we are conferring amongst ourselves so we can send you our collective comments, which will be far more efficient. I note that we are not aware of any imminent document production and also that it took you two months to respond to our last comments on this document. Your patience would be appreciated.

Kind regards,

Linda

**Linda C. Goldstein**

**Dechert LLP**

[1095 Avenue of the Americas](http://www.dechert.com)

[New York, New York 10036](http://www.dechert.com)

[+1 212 698 3817](tel:+12126983817) Direct

[+1 917 613 3562](tel:+19176133562) Mobile

[+1 212 698 0684](tel:+12126980684) Fax

[linda.goldstein@dechert.com](mailto:linda.goldstein@dechert.com)

[dechert.com](http://www.dechert.com)

On Feb 25, 2022, at 3:36 PM, Aaron Schlanger <[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)> wrote:

[REDACTED]

[EXTERNAL EMAIL]

Counsel,

When we can anticipate receiving your response with respect to the proposed edits to the draft protective order?

Regards,

Aaron Schlanger

Attorney at Law

**OSEN LLC**

190 Moore Street, Suite 272

Hackensack, NJ 07601 / USA

Telephone 201.265.6400

Facsimile 201.265.0303

[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)

[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. OSEN LLC - Attorneys at Law.

---

**From:** Aaron Schlanger

**Sent:** Wednesday, February 16, 2022 9:49 AM

**To:** 'Berger, Mitchell' <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; 'Baloul, Gassan A.' <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>; 'Alonzo, Joseph' <[joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com)>; 'Jonathan Siegfried' ([jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)) <[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; 'linda.goldstein@dechert.com' <[linda.goldstein@dechert.com](mailto:linda.goldstein@dechert.com)>; 'michael.mcginley@dechert.com' <[michael.mcginley@dechert.com](mailto:michael.mcginley@dechert.com)>; 'tamer.mallat@dechert.com' <[tamer.mallat@dechert.com](mailto:tamer.mallat@dechert.com)>; 'Romeo, Justin M.' <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; 'Mark G. Hanchet' ([mhanchet@mayerbrown.com](mailto:mhanchet@mayerbrown.com))' <[mhanchet@mayerbrown.com](mailto:mhanchet@mayerbrown.com)>; 'rhamburg@mayerbrown.com' <[rhamburg@mayerbrown.com](mailto:rhamburg@mayerbrown.com)>; 'apincus@mayerbrown.com' <[apincus@mayerbrown.com](mailto:apincus@mayerbrown.com)>; 'Marc R. Cohen' ([mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com))' <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; 'Alex C. Lakatos' ([alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com))' <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; 'Christopher J. Houpt' ([choupt@mayerbrown.com](mailto:choupt@mayerbrown.com))' <[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)>; 'hweisburg@shearman.com' <[hweisburg@shearman.com](mailto:hweisburg@shearman.com)>; 'msullivan@ashcroftlawfirm.com' <[msullivan@ashcroftlawfirm.com](mailto:msullivan@ashcroftlawfirm.com)>; 'bleske@ashcroftlawfirm.com' <[bleske@ashcroftlawfirm.com](mailto:bleske@ashcroftlawfirm.com)>; 'Rivkin, David' <[drivkin@bakerlaw.com](mailto:drivkin@bakerlaw.com)>; 'DeLaquil, Mark' <[mdelaquil@bakerlaw.com](mailto:mdelaquil@bakerlaw.com)>; 'Foley, Elizabeth P.' <[efoley@bakerlaw.com](mailto:efoley@bakerlaw.com)>; 'ccurran@whitecase.com' <[ccurran@whitecase.com](mailto:ccurran@whitecase.com)>; 'herb@whitecase.com' <[herb@whitecase.com](mailto:herb@whitecase.com)>; 'Lizmi, David' <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>

**Cc:** Gary Osen <[gosen@osenlaw.com](mailto:gosen@osenlaw.com)>; Ari Ungar <[aungar@osenlaw.com](mailto:aungar@osenlaw.com)>; Cindy Schlanger <[cschlanger@osenlaw.com](mailto:cschlanger@osenlaw.com)>;

Michael Radine <[mradine@osenlaw.com](mailto:mradine@osenlaw.com)>; Dina Gielchinsky <[dgielchinsky@osenlaw.com](mailto:dgielchinsky@osenlaw.com)>; [tab@turner.com](mailto:tab@turner.com)

**Subject:** RE: Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

Counsel,

I am following up regarding the proposed edits to the draft protective order that we sent last week to see when we can anticipate receiving your response.

Regards,

Aaron Schlanger  
Attorney at Law

**OSEN LLC**

190 Moore Street, Suite 272  
Hackensack, NJ 07601 / USA  
Telephone 201.265.6400  
Facsimile 201.265.0303  
[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)  
[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail

transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. OSEN LLC - Attorneys at Law.

---

**From:** Aaron Schlanger

**Sent:** Monday, February 7, 2022 1:13 PM

**To:** Berger, Mitchell <[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)>; Baloul, Gassan A. <[gassan.baloul@squirepb.com](mailto:gassan.baloul@squirepb.com)>; Alonzo, Joseph <[joseph.alonzo@squirepb.com](mailto:joseph.alonzo@squirepb.com)>; Jonathan Siegfried ([jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)) <[jonathan.siegfried@dlapiper.com](mailto:jonathan.siegfried@dlapiper.com)>; linda.goldstein@dechert.com; michael.mcginley@dechert.com; tamer.mallat@dechert.com; Romeo, Justin M. <[Justin.Romeo@dechert.com](mailto:Justin.Romeo@dechert.com)>; Mark G. Hanchet ([mhanchet@mayerbrown.com](mailto:mhanchet@mayerbrown.com)) <[mhanchet@mayerbrown.com](mailto:mhanchet@mayerbrown.com)>; rhamburg@mayerbrown.com; apincus@mayerbrown.com; Marc R. Cohen ([mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)) <[mcohen@mayerbrown.com](mailto:mcohen@mayerbrown.com)>; Alex C. Lakatos ([alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)) <[alakatos@mayerbrown.com](mailto:alakatos@mayerbrown.com)>; Christopher J. Houpt ([choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)) <[choupt@mayerbrown.com](mailto:choupt@mayerbrown.com)>; hweisburg@shearman.com; msullivan@ashcroftlawfirm.com; bleske@ashcroftlawfirm.com; Rivkin, David <[drivkin@bakerlaw.com](mailto:drivkin@bakerlaw.com)>; DeLaquil, Mark <[mdealaquil@bakerlaw.com](mailto:mdealaquil@bakerlaw.com)>; Foley, Elizabeth P. <[efoley@bakerlaw.com](mailto:efoley@bakerlaw.com)>; ccurran@whitecase.com; nerb@whitecase.com; Lizmi, David <[david.lizmi@squirepb.com](mailto:david.lizmi@squirepb.com)>

**Cc:** Gary Osen <[gosen@osenlaw.com](mailto:gosen@osenlaw.com)>; Ari Ungar <[aungar@osenlaw.com](mailto:aungar@osenlaw.com)>; Cindy Schlanger <[cschlanger@osenlaw.com](mailto:cschlanger@osenlaw.com)>; Michael Radine <[mradine@osenlaw.com](mailto:mradine@osenlaw.com)>; Dina Gielchinsky <[dgielchinsky@osenlaw.com](mailto:dgielchinsky@osenlaw.com)>; tab@turner.com

**Subject:** Bartlett v. Societe Generale de Banque au Liban , 19-cv-00007 (CBA)(TAM)

Counsel,

Attached are our further proposed edits to the Protective Order which attempt to address and take into consideration your December 7, 2021, comments to the prior draft. We have accepted many of your proposed edits and left a redline of what we believe to be either new language we're proposing or prior language we have reinstated. However, because of the volume of prior comments and edits, we recommend you run your own redline of the document against your own prior version. As discussed earlier, we think that it makes sense to leave the internal cross-referencing to subsections until all of the language has been agreed upon.

We look forward to your further views.

Regards,

Aaron Schlanger  
Attorney at Law

**OSEN LLC**

190 Moore Street, Suite 272  
Hackensack, NJ 07601 / USA  
Telephone 201.265.6400  
Facsimile 201.265.0303  
[aschlanger@osenlaw.com](mailto:aschlanger@osenlaw.com)  
[www.osenlaw.com](http://www.osenlaw.com)

**CONFIDENTIALITY NOTICE:** The information contained in this electronic mail communication is intended only for the individual or entity to whom it is addressed. It may contain privileged and confidential information that is exempt from disclosure by law, and if you are not the intended recipient you may not copy, distribute or take any action in reliance upon it. If you have received this e-mail transmission in error, please notify our office immediately by e-mail or by telephone. Thank you for your cooperation. OSEN LLC - Attorneys at Law.

---

This e-mail is from Dechert LLP, a law firm, and may contain information that is confidential or privileged. If you are not the intended recipient, do not read, copy or distribute the e-mail or any attachments. Instead, please notify the sender and delete the e-mail and any attachments. Thank you.

---

45 Offices in 20 Countries

This message is confidential and may be legally privileged or otherwise protected from disclosure. If you are not the intended recipient, please telephone or email the sender and delete this message and any attachment from your system; you must not copy or disclose the contents of this message or any attachment to any other person.

For information about how Squire Patton Boggs processes UK and EU personal data that is subject to the requirements of applicable data protection laws, please see our Privacy Notice regarding the processing of UK and EU personal data about clients and other business contacts at [www.squirepattonboggs.com](http://www.squirepattonboggs.com).

Squire Patton Boggs (US) LLP is part of the international legal practice Squire Patton Boggs, which operates worldwide through a number of separate legal entities. Please visit [www.squirepattonboggs.com](http://www.squirepattonboggs.com) for more information.

#US

---